07-cv-08479-AKH Document 10

Filed 10/10/2007 12 Page 1 of 101

0.2007



THE CITY OF NEW YORK

LAW DEPARTME

NEW YORK, NY 10007

Phone: (212) 788-0768 Fax: (212) 791-9714

LMOED@LAW.NYC.GOV

October 5, 2007

The Honorable Alvin K. Hellerstein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007-1312

by fax: (212) 805

Dear Judge Hellerstein:

MICHAEL A. CARDOZO Corporation Counsel

> I write to request a 29-hour extension of the deadline of noon on Monday, October 8, 2007, that has been set in the above-referenced case. I was assigned this case last evening. The City's papers in response to plaintiff's application for a preliminary injunction are due Monday, October 8, at noon. The offices of City agencies are closed on Saturday, Sunday, and this Monday, a federal holiday. Thus, the ability to consult with City agencies in order to adequately respond to plaintiff's application is restricted to today only. I ask that the City be given the benefit of being able to complete its papers on Tuesday, October 9, in consultation with City personnel and file the papers electronically by 5 pm on Tuesday.

Doe v. Kusum, 07 CV 8479 (AKH) (KHD)

I phoned the office of plaintiff's counsel and was told that she is not in the office today and that no one else in the law firm is working with her on this case. Thus, I cannot determine her position on this request.

No previous extensions of time have been requested in this case.

Thank you for your consideration.

Respectfully submitted,

Louise A. Moed (LM 7442)

Assistant Corporation Counsel

cc: V. Elizabeth Grayson, attorney for plaintiff, by fax: (212) 757-0469